



Our Ref: 3541-01/P-A/BC

29 September 2023

Gwyn Humphreys  
Senior Planning Officer  
Wrexham County Borough Council

Dear Sir

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (WALES) REGULATIONS 2017 – REGULATION 24 SUBMISSION**

**Application for full planning permission for the construction and operation of a north access road into the Kronospan Facility, lorry park, weighbridges and weighbridge building, weighbridge car park and facilities block, roundwood storage areas, 132kV substation, and ancillary works (the Proposed Development) on land immediately north of the existing Kronospan facility, Holyhead Road, Chirk – WCBC Reference P/2022/1080**

I write as the planning agent on behalf of Kronospan Limited regarding the submission of the planning application (referenced above) to Wrexham County Borough Council (WCBC) on 13 December 2022.

Following formal submission of updated and additional information pursuant to Regulation 24 of the Town and County Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (EIA Regulations 2017) on 01 August 2023, a consultation response received by WCBC from Cadw stated *“the bund located alongside the B5070, from the roundabout and entrance to the site, to the point where the road to the weighbridge car park meets with it, is now superfluous, as its purpose was to screen parked lorries in the area of parking that has now been removed. To construct this bund will require the removal of mature trees and cause damage to the soils of the proposed wildflower grasslands area. Consequently, this section of bund should be removed from the plans for the development.”* This comment was supported by WCBC and issued to the Applicant for further consideration.

The Applicant held separate meetings with WCBC and Cadw during the week commencing 28 August 2023 to discuss this further revision to the Proposed Development design. Subsequently, it was agreed that the design would be revised, acknowledging that the bund in this location provided an element of noise mitigation and that additional noise mitigation adjacent the HGV access road between the proposed lorry park and the proposed roundabout would be required.

Consultation responses received by WCBC from National Trust and the Clwyd-Powys Archaeological Trust objecting to proposed off-site landscaping enhancement proposals at Location 4 (Offas Dyke Scheduled Monument). The proposed off-site landscaping enhancements at this location have subsequently been removed from the relevant plans.

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The key changes implemented in the revised Proposed Development design (excluding the previous changes issued on 01 August 2023 referenced above) are summarised below:

- The removal of the northern part of the previously proposed bund along the eastern boundary of the Site, adjacent to the B5070 Holyhead Road.
- Associated revisions to the proposed landscape design, allowing the retention of existing woodland and hedgerow vegetation in the area of the now removed bund.
- Further noise mitigation in the form of a solid acoustic screen east of the HGV access road (the western arm of the proposed roundabout as it starts to head towards the proposed lorry park).
- Removal of the previously proposed off-site landscaping enhancement proposals at Offas Dyke.

As a result of the revised Proposed Development design, the following updates (and new documents) to the previously submitted Environmental Statement (ES) and other supporting documents, ES Figures and Planning Drawings, have been provided:

#### **Planning Drawings (Updated)**

- Planning Drawing 1\_revB: Proposed Development – General Arrangement
- Planning Drawing 2\_revB: Proposed Development – Proposed Landform
- Planning Drawing 3a\_revB: Proposed Development - Illustrative Landscape Masterplan
- Planning Drawing 3b\_revB: Proposed Development – Off-Site Landscape Enhancements
- Planning Drawing 4a\_revB: Proposed Development – Illustrative Landscape Cross Sections – Sheet 1
- Planning Drawing 4b\_revB: Proposed Development – Illustrative Landscape Cross Sections – Sheet 2

#### **ES Figures (Updated)**

- ES Figure 4.1\_revB: Proposed Development – General Arrangement
- ES Figure 4.2\_revB: Proposed Development – Proposed Landform
- ES Figure 4.3a\_revB: Proposed Development - Illustrative Landscape Masterplan
- ES Figure 4.3b\_revB: Proposed Development – Off-Site Landscape Enhancements
- ES Figure 4.4a\_revB: Proposed Development – Illustrative Landscape Cross Sections – Sheet 1
- ES Figure 4.4b\_revB: Proposed Development – Illustrative Landscape Cross Sections – Sheet 2
- ES Figure 5.1b\_revB: Landscape and Visual Context with Lorry ZTV
- ES Figure 8.2\_revB: Acoustic Screening Mitigation

#### **ES Volume 1 Main Report (Addendum Documents – New)**

- ES Chapter 5.0 Landscape and Visual Impact Assessment – Addendum 1
  - This is to be read in tandem with the previously issued ES Chapter 5.0 and concludes no changes to the overall conclusions.
- ES Chapter 8.0 Noise and Vibration – Addendum 1
  - This is to be read in tandem with the previously issued ES Chapter 8.0 and concludes no changes to the overall conclusions.
  - The results of updated noise predictions provided in Tables 8.29 and 8.30 with the additional mitigation measures show a slight reduction in noise levels at noise sensitive receptors.

#### **Planning Statement (PS) Appendices (Updated and New)**

- PS Appendix C\_revB: Arboricultural Impact Assessment (AIA) (Updated)
  - This is version 3 of the AIA and supersedes previous versions issued. Compared to the previous version (revA), the revisions to the Proposed Development design result in the

reinstatement/retention of a further 12 individual trees, one tree group, one part tree group, and one part hedgerow (compared to the previous design).

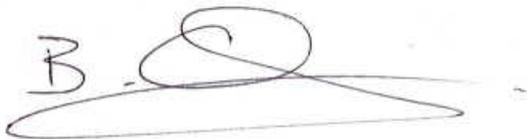
- PS Appendix F - Transport Assessment (TA) Addendum 2
  - This is to be read in tandem with the previously issued TA and the previously issued TA Addendum 1 and addresses the construction impact of the off-site disposal of spoil associated with the part removal of the bund along the eastern boundary of the Site.
  - The TA Addendum 2 concludes that the proposed construction phase would result in minimal impact on the assessed study area, with increases in total vehicle traffic that are low in absolute terms. It is not expected that the proposed construction phase would result in any impact that could be considered severe.

Whilst there are other parts of the currently submitted planning application documents that would be affected by the revision to the Proposed Development design (such as: ES Chapter 3.0 Alternatives; ES Chapter 4.0 Description of Proposed Development; some of the photomontages at ES Figure 5.3; the ES Non-Technical Summary; the Planning Statement; the Design and Access Statement etc), it is not considered that any subsequent (and not undertaken) changes to these documents and plans would be material to the effect their key content and conclusions would no longer stand up in planning terms. In other words, the revision to the Proposed Development design is minor in nature and the updates subject to this further Regulation 24 submission to WCBC are focused on the more notable aspects of the planning application where direct implications can reasonably be expected.

the Environmental Statement, as well as the Planning Drawings and several (planning application) supporting documents have been updated (Rev A). These are now formally submitted to WCBC pursuant to Regulation 24 of the Town and County Planning (Environmental Impact Assessment) (Wales) Regulations 2017.

I trust the above is clear. Should you have any queries please do not hesitate to contact me at [bobbyclayton@axis.co.uk](mailto:bobbyclayton@axis.co.uk).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Bobby Clayton', with a large, stylized flourish underneath.

Bobby Clayton  
**Associate (Axis on behalf of Kronospan Limited)**